

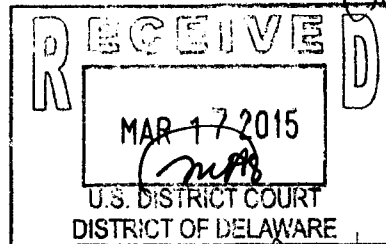
In The United States District Court for
District of Delaware

DeShunda Dumbo

PRO SE Plaintiff

CA. NO 14-1135-GMS

V
SGT William Kuschel



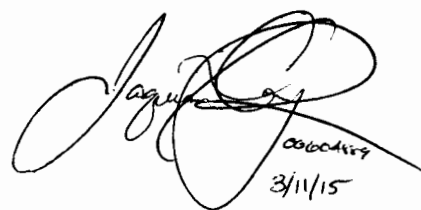
MOTION for Appointment of
Counsel

1. Plaintiff is A Prose Infringer
2. Plaintiff has Stated A Claim in which
Relief Can be Granted
3. Plaintiff submit's Affidavit's of witnesses
IN which become Genuine factual material
that exists
4. Plaintiff has A 9th Grade Education
5. Plaintiff is A Active Infringer
- IN 7 Case in U.S.D.C. 1 in JP-4
6. in Family Court is A Advocate Against
Solitary Confinement.

D. Dumbo on
#365566

Date: March 11th, 2015

I, Juan Cruz, have witnessed on multiple occasions that Sgt. William Kushel, during pat and frisk searches, has been inappropriately sexual in his proceedings of such. He often rubs the chest, waist and inner thigh/leg areas slowly and pervertedly. Showing extra "care" to the nipple area, lower back and inner thighs near the genital area. I haven't ever allowed him to pat and frisk me because he has a reputation of doing these homosexual things to inmates. Both inmates and Correctional Officers know this about him. However, the issue is never ~~even~~ resolved and Sgt. Kushel continues to laugh about his perverted homosexual behavior with other C/O's and Lt.'s in the buildings he works. I've been told by multiple inmates of his behavior, seen his behavior with my own eyes on several occasions leaving the building 24 A and B chowhalls and have witnessed multiple inmates file grievances and verbally complain about his conduct during pat and frisk searches.


Cruz
3/11/15

Certificate of Service

I, DeShawn Drango SR hereby certify that I have served a true and correct cop(ies) of the attached Motion(AOC), Reply to Complaint & TRO

Upon the following parties/persons:

To: U.S. D.C.
844 N. King Street
Wilm, DE
19801

To: Stuart Dworkitz
820 N. French St
Wilm, DE
19801

To: _____

To: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the James T. Vaughn Correctional Center, Smyrna, DE 19977.

On this 15 day of March, 20 15

